

EXHIBIT

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UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

WILLIAM G. STEVENS,  
Plaintiff,

CIVIL ACTION NO.  
04-11938-JLT

v.

ROBERT HOWLAND, et al.,  
Defendants.

**AFFIDAVIT OF WILLIAM G. STEVENS**

1. I am the plaintiff in the above entitled action.
2. I am currently civilly committed at the Massachusetts Treatment Center pursuant to M.G.L. c. 123A
3. I am a follower of the Wiccan religion and have practiced Wicca in various forms since 1983.
4. During the portions of my Wiccan practice, in which I was not incarcerated, I maintained a personal altar at, or near my home at which I was able to worship on a daily basis.
5. I, currently, am not able to maintain a personal altar due to Department of Correction property policy and space considerations.
6. I am ordained as a priest through the Universal Life Church and have further accomplished the steps necessary to be recognized as a High Priest of the Wiccan faith.
7. As a state prison inmate at N.C.C.I. Gardner I was allowed to lead Wiccan group worship services without adverse consequences and without abusing, what the defendants deem to be, the position of authority over other inmates.
8. As a state prison inmate at N.C.C.I. Gardner I was able to utilize lighted candles and incense for group meditation

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and worship services without the need for outside volunteers or DOC supervision. Again, without adverse consequences.

9. Currently, the few allowed "meeting times" rarely coincide with Sabbat and Esbat occurrences at the Treatment Center. See Attachment 1 for 2005 Sabbat dates vis-a-vis approved meeting times.

10. In the, nearly, three years since my incarceration at the Treatment Center I have, on numerous occasions, requested verbally, in writing, and in grievances that the defendants provide outside volunteers so Wiccan worship services could be performed. Defendants have been unwilling to utilize the contacts I have provided.

11. I have, since my transfer to the Treatment Center, been unable to practice my religion by engaging in group worship services in a manner that is meaningful to me as well as accepted Wiccan practice.

12. Wiccan religious practice is conducted within the confines of a "protective circle", this circle needs to be a minimum of 9' in diameter for group corporate worship to allow for freedom of movement within the circle. The room accommodating the circle must be large enough that the circle can be circumnavigated without violating the boundary.

13. Recently the Native American religious group has been meeting outside during their weekly meetings to perform their Smudge ceremony.

Signed under the pains and penalties of perjury this 23rd day of October, 2006

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William G. Stevens

WICCAN SABBATS for 2005

EXHIBIT  
 ATTACHMENT  
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	NAME	ACTUAL DATE	PER M.T.C. CELEBRATED*
1 <sup>ST</sup> SABBAT	IMBOLC	FEB 1	FEB 2
2 <sup>ND</sup> SABBAT	OSTARA	MAR 20 1 <sup>ST</sup> DAY OF SPRING/EQUANOX	MAR 18
3 <sup>RD</sup> SABBAT	BELTAIN	APR 30	APR 29
4 <sup>TH</sup> SABBAT	LITHA	JUNE 21 1 <sup>ST</sup> DAY OF SUMMER/SOLSTICE	JUNE 22
5 <sup>TH</sup> SABBAT (loo-nassa)	LUGHNASSAD	AUG 1	JULY 29
6 <sup>TH</sup> SABBAT	MABON	SEPT 22 1 <sup>ST</sup> DAY OF AUTUMN/EQUANOX	SEPT 21
7 <sup>TH</sup> SABBAT (sow-in)	SAMHAIN	OCT 31	OCT 28
8 <sup>TH</sup> SABBAT	YULE	DEC 21 1 <sup>ST</sup> DAY OF WINTER/SOLSTICE	DEC 21

- Due to scheduling these are the dates CIVIL Wiccans will celebrate their Sabbats.